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3 Social Security Administration
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8 Attorneys for Defendant

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12 **LAS VEGAS DIVISION**

13 RHONDA R. HESS,)	Case No: 2:18-cv-02431-JAD-CWH
14)	
Plaintiff)	
15)	STIPULATION FOR EXTENSION OF
v.)	TIME TO FILE DEFENDANT'S CROSS
16)	MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
17 Commissioner of Social Security,)	(Second Request)
18)	
Defendant.)	
19)	

20 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests
21 an extension of time of thirty days to Monday, July 15, 2019, to prepare and file her cross motion
22 to affirm. This is the Commissioner's second request for an extension.

23 Defendant respectfully requests this extension of time because of a very heavy workload,
24 as a result of an increase in case receipts and multiple extended absences from the office, leading
25 to more than twelve district court merits briefs being due in the next month.

1 On June 17, 2019, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: June 17, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/*Cyrus Safa

7 CYRUS SAFA

8 *authorized by email June 17, 2019

9 Attorney for Plaintiff

10 Date: June 17, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

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20 IT IS SO ORDERED.

21
22 DATE: June 18, 2019

23 
HONORABLE CARL W. HOFFMAN
24 United States Magistrate Judge

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CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: June 17, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant